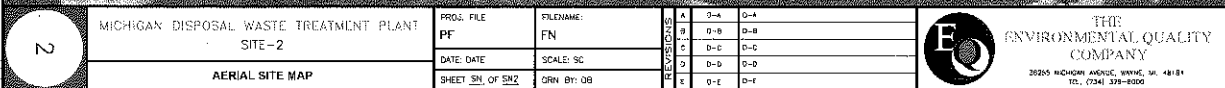
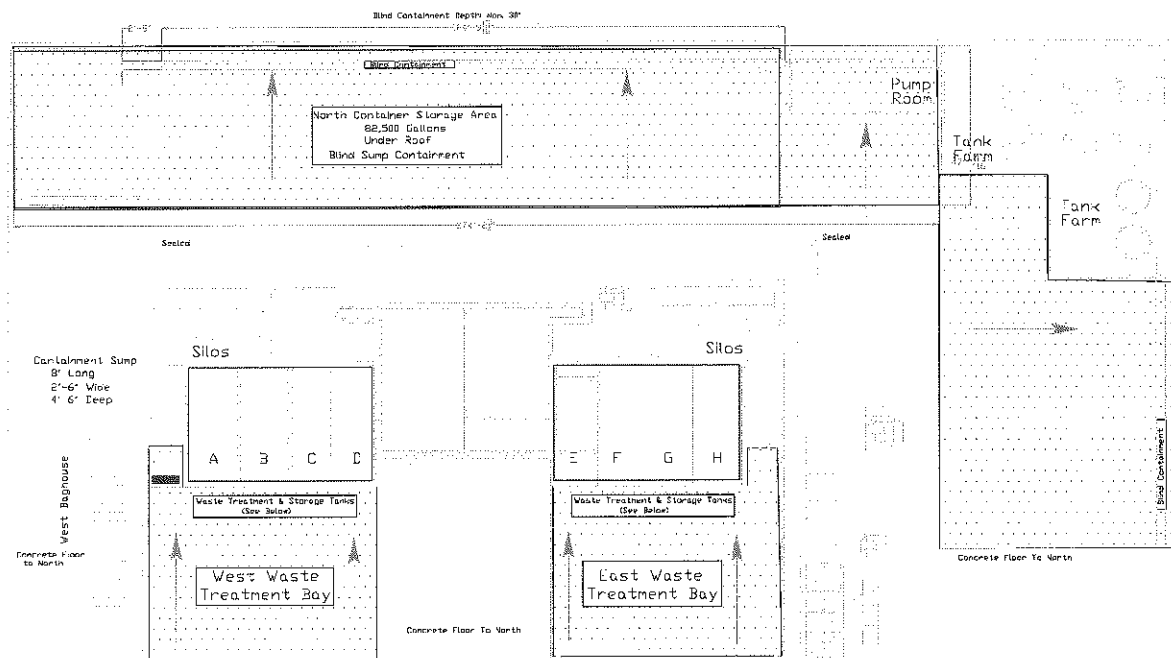


US EPA ARCHIVE DOCUMENT

Figures







Waste Treatment & Storage Tanks
A & B: 48,480 gallon each
C & D: 44,400 gallon each
Enclosed
Double Wall Construction

Treatment Tank Dimensions
A & B: 33' 11" Long
14' Wide
13' Deep (Nominal)
C & D: 33' 11" Long
11' 4" Wide
13' 1" Deep (Nominal)

Waste Treatment & Storage Tanks
E & F: 44,400 gallon each
G & H: 48,480 gallon each
Enclosed
Double Wall Construction

Treatment Tank Dimensions
E & F: 33' 11" Long
11' 7" Wide
14' 7" Deep (Nominal)
G & H: 33' 11" Long
14' 1" Wide
14' 6" Deep (Nominal)

Containment Area Details

East Container Storage Area:
Xypex Treatment Waterstop

North Container Storage Area:
Xypex Treatment Waterstop

West Waste Treatment & Storage Bay:
MG Crete Coating
Concrete Base
Waterstop

West Waste Treatment & Storage Tanks:
1/2" Steel Plate
Waterstop

East Waste Treatment & Storage Bay:
MG Crete Coating
Concrete Base
Waterstop

East Waste Treatment & Storage Tanks:
1/2" Steel Plate
Waterstop

— PCB COMMERCIAL STORAGE AREAS

REVISIONS	A
	B
	C
	D
	E



Attachment A

PCB Commercial Storage
Checklist

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

I. SUMMARY INFORMATION

Facility name: Michigan Disposal Waste Treatment Plant

Owner/Operator name: Michigan Disposal, Inc.

Parent firm name: Environmental Quality Company

Facility address: 49350 I-94 Service Drive North, Belleville, MI 48111

Telephone: 734.699.6286

EPA/Application I.D. number: MID000724831

Is this a RCRA-permitted facility? Yes

Status of application: Final

II. STORAGE CAPACITY

Maximum storage capacity: 472,300 gallons (2340 yd³)

Maximum PCB waste handled at any time: 472,300 gallons (2340 yd³)

III. DESIGN QUALIFICATIONS

Status of compliance with standards in 40 CFR 761.65(b) and/or (c) (7): Meets applicable 40CFR 761.65(b) requirements

Reasons for not meeting standards: N/A

IV. REVIEW OF CLOSURE PLAN

Expected year of closure: 2050 or after

Status of closure plan: Included with Application

Reasons plan is incomplete: N/A

CLOSURE PLAN CHECKLIST FOR COMMERCIAL PCB STORAGE FACILITIES

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

Facility Description

	Provided	Not Applicable	Comments
General Description	X		
Jurisdiction in which facility is located	X		
Written description as well as topographic map detailing information on:	X		
PCB storage facilities	X		
PCB treatment and disposal	X		Only Processing of Solid PCB Waste
Hazardous waste management units (if RCRA permitted also)	X		
All buildings and structures	X		
Any 100-year floodplain	X		
Adjacent surface waters or wetlands	X		Discussion of Drainage Features
Surrounding land uses	X		
Other key topographic features	X		
Traffic patterns	X		
Location and status of underground storage tanks		X	
Location and nature of security systems	X		
Closed PCB Units (or hazardous waste management units if RCRA permitted.)		X	

Description of environmental conditions on-site:

	Provided	Not Applicable	Comments
Proximity to surface waters including ponds, lagoons, wetlands, and storage reservoirs.	X		
Proximity to public or private drinking water sources		X	
Sewer location and design which could result in contamination of sewers or sewage treatment systems from PCB spills		X	

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

	Provided	Not Applicable	Comments
Location of nearby grazing lands, farms, and vegetable gardens		X	
Presence of a shallow well, ground water near the surface, or which poses a high potential for ground-water contamination		X	

Detailed description with engineering drawings of facility design:

	Design Capacity	Monitoring	Containment System
Roof and walls	N/A	N/A	N/A
Flooring	X	X	X
Curbing and its containment volume	X	X	X
Drain valves, floor drain, etc.	X	X	X
Storage pallets outside of storage buildings (including locations and numbers)	N/A	N/A	N/A
Bulk tanks	X	X	X

Disposal of PCB Waste Inventory:

	Provided	Not Applicable	Comments
Maximum Inventory	X		
Provide design capacity	X		
Estimate of maximum and quantities of:			
PCB Articles		X	
PCB Article Containers		X	
PCB liquids in Bulk Tanks		X	
PCB Containers	X		
PCB Capacitors		X	
PCB Transformers		X	
PCB Contaminated Electrical Equipment		X	

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

	Provided	Not Applicable	Comments
Other PCBs	X		Bulk Product Waste Remediation Waste
Total PCB Inventory	X		

Disposal of Inventory

	Provided	Not Applicable	Comments
Details to ensure compliance as a PCB waste generator	X		
Estimate of maximum inventory to be sent off-site	X		
Description of any treatment prior to transport, if applicable	X		
Methods and arrangements used for PCB waste removal and transportation off-site to approved storage and disposal facilities	X		
Description of treatment of disposal methods at the final treatment or disposal facilities	X		
Bulk tank removal, transport, tracking, and off-site disposal of tank capacity	X		
Proposed schedule to complete disposal within 90 days from closure commencement	X		

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

Closure Plan Sampling, Decontamination, and Compliance with the Spill Cleanup Policy

Identification and classification of items to be decontaminated

	Use	Structures/ Equipment Construction Materials	Spill Cleanup Policy Classification of Materials, Structures, and Equipment	Numerical Cleanup Levels Applicable from the Spill Cleanup Policy
Facility structure components (roof, walls etc.)				N/A
Surrounding soil, pavement and vegetation				40 CFR 761.61
Containment systems and piping				10 ug/100 cm ²
Equipment				10 ug/100 cm ²
Pallets				N/A
Bulk tanks				10 ug/100 cm ²
Other				

Pre-cleanup survey and sampling

- A. Visual inspection to ascertain sampling boundaries includes detailed discussion of inspections for PCB contaminated residues or particulate matter on:

	Provided	Not Applicable	Comments
Tanks	X		
Valves and piping		X	
Equipment	X		
Containment areas	X		
Soil	X		

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

OTHER

B. Sampling survey should include:

	Provided	Not Applicable	Comments
Discussion of materials for soil and aqueous materials	X		
Discussion and maps of proposed grid sampling	X		No Maps
Sampling plan for solid surfaces	X		
Sampling for the penetration and contamination of PCBs into solid surfaces		X	
Discussion of validity of statistical sampling plan	X		
QA/QC	X		

Decontamination

Cleanup methods for each contaminated component should be described in detail

	Description of Decontamination Method	Description of Worker Protection Measures
Facility walls	N/A	N/A
Floors	X	X
Roof	N/A	N/A
Soil	X	X
Containment systems and valves	X	X
Equipment	X	X
Pallets	N/A	N/A
Bulk tanks	X	X
OTHER		

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

A description of the criteria used to choose each decontamination method for the components listed below:

	Effectiveness	Equipment	Support Facilities Needed	Time Requirements	Safety Requirements	Amounts of Wastes Generated
Facility walls	N/A					
Floors	X	X	X	X	X	X
Roof	N/A					
Soil	X	X	X	X	X	X
Containment systems and valves	X	X	X	X	X	X
Equipment	X	X	X	X	X	X
Pallets	N/A					
Bulk tanks	X	X	X	X	X	X
OTHER						

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

Decontamination should also detail post cleanup verification sampling especially visually contaminated areas:

Decontamination, containerization and disposal of both PCB and non-PCB wastes produced in facility decontamination, including solvents, rags and equipment

	Provided	Not Applicable	Comments
Estimates of wastes produced from:	X		
Decontamination of equipment	X		
Decontamination of structures	X		
Decontamination of grounds		X	
Post cleanup verification	X		
Estimates of transportation of above wastes	X		
Estimates of disposal facilities that would take these wastes	X		

Other Activities Covered in the Closure Plan:

	Provided	Not Applicable	Comments
Ground-water monitoring plan	X		
Treatment, removal, and disposal of run-on and run-off due to contamination procedures	X		
Security measures to prevent unintentional or unpermitted access to the site	X		

INITIAL COST ESTIMATE CHECKLIST

1. X Written closure cost estimate is certified by the person who prepared it using the wording in Exhibit 5-4 (40 CFR 761.13)
2. X The closure cost estimate covers all activities in the closure plan and reflects current costs.

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

3. X The cost estimate covers costs closing the facility at the time when costs would be the highest.
4. X The cost estimate includes the costs of off-site disposal at a commercial facility, unless the owner or operator has demonstrated that disposal capability and capacity will be available on-site.
5. X The estimate is based on the costs of hiring a third party to conduct closure.
6. X No salvage value is included in the cost estimate for any wastes, equipment, land, facility structures, or other assets associated with the facility.

TRUST FUND CHECKLIST

Step 1. The necessary documents have been submitted:

- An originally signed duplicate copy of the trust agreement.
- A completed Schedule A.
- A completed Schedule B.
- A notarized, formal certificate of acknowledgement.

Step 2. The Trustee is qualified:

- Has the authority to act as a Trustee.
- Is regulated and examined by a Federal or State agency.

Step 3. The wording of the trust agreement is substantially similar to RCRA's wording for the Trust Fund Agreements (see Exhibit 6-5).

Step 4 Compare the level of coverage to the approved cost estimate; if necessary, immediately notify the storer to obtain additional assurance within 60 days for any unassured costs.

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

Step 5. Relevant information is recorded:

- _____ Name, address and EPA identification number of the facility(ies).
- _____ Name of the financial institution.
- _____ The amount of coverage for each facility and the effective date of the trust agreement.
- _____ Documentation for review of the mechanism.

Step 6. _____ The initial payment into the trust fund is sufficient.

Step 7. _____ Closure cost estimate and trust fund Schedule A are updated. After the pay-in period is completed, if the cost estimate increases to more than the current valuation of the trust fund, then, within 60 days, either additional payments should be made into the fund to cover the difference or another financial assurance mechanism should be obtained to cover the difference.

Step 8. _____ The proper annual payments have been made.

Step 9. _____ The trustee remains qualified.

Step 10. _____ Changes in trustee approved.

Step 11. _____ Authorize reimbursement from the fund to the owner or operator when appropriate.

Step 12. Consent to the termination of the trust only if:

- _____ Alternate insurance is substituted, or
- _____ The owner or operator is released from applicable TSCA financial requirement.

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

SURETY BOND CHECKLIST

Step 1. The necessary documents have been submitted:

- _____ The surety bond.
- _____ An original signed duplicate of a trust or standby trust agreement.

Step 2. The surety is qualified:

- _____ The surety is listed on Circular 570 and is licensed in the state.
- _____ The surety has a sufficiently large underwriting limitation (or shares the risk with other sureties or reinsurers and the combined underwriting limitation is not exceeded).
- _____ The broker or agent's power of attorney is authorized by the surety to issue this type of bond in the amount needed.
- _____ The trustee institution for the trust fund or standby trust is qualified.

Step 3. The surety bond is:

- _____ Effective by 180 days from the effective date of the regulations (or, for facilities opening 240 days or more after the effective date, 60 days prior to the first receipt of PCB material).
- _____ Signed by both the surety representative and the owner or operator.
- _____ Worded substantially similar to RCRA's wording for surety bonds (see Exhibit 6-8).
- _____ In an amount at least equal to the most recent cost estimates.

Step 4. _____ Compare the level of coverage to the approved cost estimate; if necessary, immediately notify the owner or operator to obtain additional assurance within 60 days for any unassured costs.

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

Step 5. Relevant information is recorded:

- _____ Name, address and EPA identification number of the facility.
- _____ Amount of coverage for each facility and the effective date.
- _____ Information verification procedures performed.

Step 6. _____ Increases in cost estimates are covered within 60 days either by increases in the penal sum of surety bonds or other added financial assurance. Decreases in surety bond penal sums are approved only when sufficient coverage will remain.

Step 7. Assurance is maintained in the event of disqualification of the surety.

- _____ The Regional Office keeps track of which sureties enter bankruptcy or cease to be listed in Circular 570.
- _____ The Regional Office ensures that owners or operators obtain alternate assurance within 60 days after such events.

Step 8. Assurance is maintained in the event of cancellation:

- _____ The owner or operator is contacted following notice from the surety of intent to cancel.
- _____ The owner or operator obtains alternative means of financial assurance within 90 days after receipt of notice of cancellation, or the Regional Office draws upon the mechanism.
- _____ In the event of transfer or ownership, the surety bond is not cancelled until the new owner or operator meets financial responsibility requirements.

Step 9A. The Regional Office draws on the performance bond when:

- _____ The surety has sent notice of cancellation and no alternate financial assurance has been obtained.
- _____ The owner or operator has failed to complete proper closure of the facility.

REGION V

PCB STORAGE FACILITY APPLICATION APPROVAL REVIEW

- Step 9B. The Regional Administration draws on the payment bond:
- _____ If the surety has sent notice of cancellation and no alternate financial assurance has been obtained.
 - _____ If, prior to final closure, the owner or operator has not fully funded the standby trust.
 - _____ Within 15 days after an order to begin final closure is issued either by the Regional administrator or by a court of competent jurisdiction.
- Step 10. Requests to terminate the bond are approved in writing when:
- _____ Alternate financial assurance is substituted.
 - _____ The owner or operator has been released from financial responsibility requirements for closure.

Attachment C

TSCA Bios

Jeff R. Feeler

Chairman of the Board, President and Chief Executive Officer

Jeff Feeler is Chairman of the Board, President and Chief Executive Officer of US Ecology, Inc. Jeff brings over 20 years of business experience serving in various executive level positions including US Ecology's Chief Financial Officer from 2007 to 2012. Prior to joining the Company, Jeff worked with MWI Veterinary Supply, Inc., Albertson's, Inc., Hewlett-Packard and PricewaterhouseCoopers LLP. Jeff is a Certified Public Accountant and has a BBA of Finance and BBA of Accounting from Boise State University. Jeff joined the Board of Directors in 2013 and was appointed Chairman of the Board in 2015.

Simon Bell

Executive Vice President and Chief Operating Officer

Simon Bell is Executive Vice President and Chief Operating Officer responsible for all of the Company's operating assets and services. Bell joined the Company in 2001 as Environmental Manager at its Grand View, Idaho facility and later served as the Idaho facility's General Manager prior to being appointed Vice President of Hazardous Waste Operations in December 2005, Vice President of Operations in 2006 and Executive Vice President of Operations in 2014. Before joining the company, Bell served as Vice President and General Manager of a hazardous waste disposal facility in Colorado. Bell also served in a variety of technical and managerial roles in the mining industry in Alaska, Idaho, Nevada and South Dakota. He holds a B.S. in Geology from Colorado State University.

Andrew Marshall

Senior Vice President of Environmental Health & Safety

Andrew (Andy) Marshall is the Senior Vice President of Environmental and Health & Safety. Mr. Marshall is a Professional Engineer with over 20 years' experience assisting companies comply with environmental regulations. Prior to joining US Ecology, he was an associate at Kleinfelder, a national environmental consulting firm, and provided engineering consulting services and leading the company's environmental regulatory compliance practice. Mr. Marshall worked for Boise Cascade Corporation for thirteen years in various capacities including corporate environmental manager and as a project manager for strategic initiatives. Mr. Marshall earned his Bachelor of Science in Civil Engineering from Seattle University, his Master of Science in Environmental Engineering from Oregon State University, and MBA from Northwest Nazarene University.

Kerry Durnen

Vice President and Director of Operations

Kerry Durnen is the Vice President and General Manager overseeing operations for US Ecology's facility in Belleville, Michigan including Michigan Disposal Waste Treatment Plant (MDWTP) and Wayne Disposal, Inc. (WDI). Mr. Durnen began his career at US Ecology in January of 1997 as a Site Engineer for WDI and then was promoted to Wastewater Treatment Plant Manager in 1998, General Manager – WDI in 2002, Director of Operations – WDI in 2003 and to his current position responsible for the entire facility in 2010. Prior to joining US Ecology, Mr. Durnen worked as a Staff Engineer at Eder Associates. In this position he was responsible for various environmental remediation projects. Mr. Durnen earned a Bachelor of Science degree in Civil

and Environmental Engineering from the University of Michigan. He is a Licensed Professional Engineer in the State of Michigan.

Corey Grider
Operations Manager

Corey Grider is the Operations Manager at Michigan Disposal, Inc. (MDI), responsible for all operations at the facility. He began his career at EQ in August of 2005 as a Plant Supervisor and became the Laboratory Supervisor in September of 2007. In January of 2011 he became the Operations Manager. Prior to EQ, Mr. Grider worked as a Chemist for Perma-Fix of Michigan. In this position he was responsible for analyzing incoming waste streams as well as overseeing processing plant production. Mr. Grider earned a Bachelor of Science degree in Public Resource Management with a specialization in Environmental Economics from Michigan State University.

Attachment D

Flood Map

25251 Northline Road
Taylor, Michigan 48180
www.WadeTrim.com

Attachment E

Demonstration of
Financial Assurance